

**Federal Defenders
OF NEW YORK, INC .**

Southern District
81 Main Street, Suite 300
White Plains, N.Y. 10601-4150
Tel: (914) 428-7124 Fax: (914) 948-5109

David E. Patton
*Executive Director
and Attorney-in-Chief*

*Southern District of New York
Jennifer L. Brown
Attorney-in-Charge*

May 18, 2022

VIA ECF

The Honorable Andrew E. Krause
United States Magistrate Judge
Southern District of New York
300 Quarropas Street,
White Plains, NY 10601

Re: *United States v. Dona Taylor-Alveranga, 22-mj-3841*

Dear Honorable Judge Krause:

I write to respectfully request the Court modify the requirements of Ms. Taylor-Alveranga's appearance bond.

Ms. Taylor-Alveranga made her initial appearance on May 4, 2022, before Your Honor. Pre-Trial Services had recommended release conditions which included an unsecured bond co-signed by one financially responsible person. The government requested an unsecured bond in the amount of \$150,000 co-signed by two financially responsible persons. At the appearance, I had indicated that I knew of one person whom I believed would be approved and asked the Court to agree to Pre-Trial Services recommendation of an unsecured bond co-signed by one financially responsible person. The Court ordered Ms. Taylor-Alveranga released on her own signature to meet the terms of an unsecured bond in the amount of \$150,000 co-signed by two financially responsible persons. The Court noted it would entertain a motion to modify the conditions if the terms could not be met.

Ms. Taylor-Alveranga has secured the signature of one financially responsible person who has been approved by the United States Attorney's Office. As anticipated, after having exhausted several days attempting to find a second person to sign the bond, our office has not been able to locate a second person to meet the terms of the bond. I have spoken to the Assigned Assistant United States Attorney, Steven Kochevar, and the parties are amenable to modifying the terms of the bond to require one financially responsible person if this term is amenable to the Court.

Ms. Taylor-Alveranga respectfully requests that the Court modify the terms of her bond as noted. Thank you for your time and consideration of this matter.

Respectfully submitted,



Elizabeth K. Quinn
Assistant Federal Defender

cc: Steven Kochevar, AUSA

APPLICATION GRANTED. The bond is modified as requested -- only one financially responsible person is required to co-sign the bond for Ms. Taylor-Alveranga.

Dated: May 18, 2022

SO ORDERED.



ANDREW E. KRAUSE
United States Magistrate Judge